

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming Devices
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to:
Trombley v. 3M Co., No. 16-cv-4159

**DECLARATION OF PETER J. GOSS IN SUPPORT OF DEFENDANT 3M
COMPANY'S MEMORANDUM IN OPPOSITION TO PLAINTIFF'S MOTION
TO STRIKE PORTIONS OF 3M'S CASE-SPECIFIC EXPERT REPORTS**

Peter J. Goss, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company in this litigation. I submit this declaration in support of Defendants' Memorandum in Opposition to Plaintiff's Motion to Strike Portions of Defendants' Case-Specific Expert Reports. The facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Exhibit 1 is a true and correct copy of William Jarvis, M.D.'s case-specific report in *Nancy Axline v. 3M Co., et al.*

2. Attached as Exhibit 2 is a true and correct copy of William Jarvis, M.D.'s case-specific report in *Ada Trombley v. 3M Co., et al.*

3. Attached as Exhibit 3 is a true and correct copy of the transcript from the September 8, 2016 MDL Status Conference in *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*.

4. Attached as Exhibit 4 is a true and correct copy of William Jarvis, M.D.'s case-specific report in *Ada Trombley v. 3M Co., et al.*, which I personally highlighted according to the criteria applied by Plaintiffs in their motion to strike portions of Defendants' case-specific expert reports.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota, this 5th day of March, 2019.

s/Peter J. Goss

Peter J. Goss